



# National Association of State Telecommunications Directors

SEP 27 1993

September 22, 1993

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The Honorable James H. Quello  
Acting Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

EX PARTE PRESENTATION In CC Docket No. 92-105

Dear Chairman Quello:

On behalf of the National Association of State Telecommunications Directors ("NASTD"), I respectfully request that the Commission adopt policies and rules requiring assignment of an N11 service code to state governments. Granting this request will further the public interest by ensuring citizens uniform and easy telecommunications access to state agencies and institutions.

NASTD is the national association of government executives who manage state telecommunications networks. This task is substantial by any measure. NASTD executives procure and administer the communications facilities and systems used by the vast array of state entities, including hospitals, universities, law enforcement agencies, prisons and a multitude of other state agencies. A key aspect of this effort is ensuring that the public has convenient telecommunications access to all state institutions and programs.

Requiring assignment of an N11 service code to state governments will greatly enhance such convenience. Such codes are an abbreviated (3-digit) dialing convention that states can use to offer the public a simple "gateway" mechanism for contacting individual state institutions. Assigning the same code to each state government (e.g., "211") would further enhance citizens' convenience by creating standardized, nationwide, dial-up access to public resources. No matter what state a person happens to be in, access to public institutions would be available by dialing 211.



Honorable James H. Quello  
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FCC - MARIETTA

Last year the Commission initiated a proceeding to adopt rules governing the assignment of N11 codes (CC Docket No. 92-105). The Commission also sought comment on a tentative proposal to make such codes available to private entities for their individual use in providing local pay-per-call services. The record in Docket 92-105 demonstrates unequivocally that this proposal should not be adopted. The vast majority of commenters agree that N11 codes are an extremely scarce resource; that permitting commercial use of such codes will thereby secure an unreasonable and undue competitive advantage in the information services marketplace; and that an ample supply of alternative dialing arrangements is available for commercial purposes. Under these circumstances, adoption of the Commission's tentative proposal is an unnecessary act that will further no public policy goals.

N11 service codes are part of a world-wide telecommunications numbering plan that is, in every sense, a public resource. The NASTD strongly believes that in view of the scarcity of this resource, every effort should be made to ensure that it is utilized in a way that advances the widest possible public interest. Requiring assignment of one of the few remaining N11 service codes to state governments satisfies this test.

The principles expressed in this letter reflect those embodied in a recently adopted NASTD resolution concerning N11 service code utilization. A copy of that resolution is enclosed for your review. On behalf of all NASTD members, I respectfully request that the Commission give these principles every favorable consideration.

Sincerely,



Ray Penrod  
President, NASTD

Enclosure: NASTD N11 Resolution

cc: Commissioner Andrew C. Barrett  
Commissioner Ervin S. Duggan  
William F. Caton, Acting Secretary  
Peyton L. Wynns, Chief, Industry Analysis Division  
Allen Barna, Esquire

**National Association of State Telecommunications Directors**

16th Annual Conference and Trade Show  
September 5 - 9, 1993  
San Antonio, Texas

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FCC - N11

**RESOLUTION**

Whereas, the FCC is considering its official position on the use of N11 to provide citizens easy access to information,

Whereas, citizens rely on state governments to access information regarding services within each state,

Whereas, N11 offers an easy, memorable method for citizens throughout each state to access public information from state government,

Whereas, electronic access to government information is mandated to all state governments today and in the future,

Whereas, technological change in computing and telecommunications will offer significantly improved access to government services through the public switched network,

Whereas, the access number 911 has been designated as the common access number for emergency services, and this has proven highly beneficial to society in that 911 is now recognized by citizens as a universal, nationwide emergency access number, the designation of a second universal access number for access to state information would provide similar benefits, now therefore,

Be It Resolved that the National Association of State Telecommunications Directors respectfully requests that the FCC:

- (1) Designate 211 as the National State Information Access Number,
- (2) Assign 211 to each state government representative to NASTD to coordinate for each state,
- (3) Direct the local exchange carriers in the country to offer 211 access to state governments at cost.

Approved this 6th day of September 1993  
by the members at the  
NASTD 16th Annual Conference and Trade Show  
San Antonio, Texas



Ray Penrod  
President



Anthony Herbert  
Secretary/Treasurer